

Plant Biostimulants Guidance Response Chart

Office/Region	Response	Action by BPPD
OGC	Concur, with minimal changes (see attached mark-up pdf)	Accepted all changes
OECA-OC-MAMPD-PWTB	Concur, with some changes ¹ (Helene Ambrosino, Attorney Advisor)	<ul style="list-style-type: none"> • Edited title of Guidance; • Did not re-organize document; • Removed some proposed label claims; • Made formal request for comments from Regions
OECA-OCE-PWTB	Same as above ¹ (Joseph Varco)	Same as above ¹
AO-AAOP-ORPM-PRAD	Same as above ¹ (Joseph Adamson)	Same as above ¹
ORD	No Response	-
Region 1	No Response	-
Region 2	<i>"We have found the guidance to be useful."</i> No additional comments. (Audrey Moore, Pesticides Team Leader)	No Action Needed
Region 3	No Response	-
Region 4	Concur, with minimal change ² (Justin Mullenix, Life Scientist, R4)	Accepted change ²
Region 5	No Response	-
Region 6	No Response	-
Region 7	<p>Originally stated on 03/22: <i>"R7 has reviewed this document and at this time and date does not have any comments, additions or concerns."</i> (Mark Leshner, Entomologist, Bedbug Contact, R7)</p> <p>On 04/02, same R7 Commenter: Now agrees with OECA comments above ²</p>	Same as for OECA above ¹
Region 8	No Response	-
Region 9	No Response	-
Region 10	Concur, minimal change ³	Accepted change ³

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 - (i) Major re-organization of document requested after a "courtesy" review request (OECA only). This was not done because document structure had already been approved by BPPD and OGC
 - (ii) Requested change in document title. BPPD concurred and conducted change to current document title.
 - (iii) Stated that some excluded label claims (Tables 1a-c & 2) seemed to be too similar to claims that would be considered to be plant regulator claims (e.g. enhance plant growth/mass/yield) BPPD concurred on several claims and removed them or edited wording (see attached pdf for mark-up)
 - (iv) Stated that some phraseology for different claims seemed to express the same claims (e.g. enhances plant growth/mass/yield vs. enhances conditions for increased plant growth/mass/yield) BPPD concurred on some claims and added qualifiers such as, improves soil conditions for increased plant growth/mass/yield. In other, instances, left claim as is to be sorted out during comment period (see attached pdf for markup)
- 2 Stated that draft Guidance was useful: *"I am working on another PGR case and thanks to your previous guidance I've pretty much got it wrapped up."* Also questioned whether a change in "nutritional value" would be considered a plant regulator claim. BPPD concurs that a claim for a change in "nutritional value" would constitute a plant regulator claim.
- 3 Questioned whether the word "biotic" should be in the claim "Reduces/protects against abiotic/biotic stress by improved nutrient/water uptake/availability. BPPD concurs that "biotic" should be removed from statement as it is an incorrect statement.